

# **EXHIBIT A**

**EXHIBIT A****Case Administration (65.20 Hours; \$ 20,092.00)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Elihu Inselbuch	3.10	\$630	1,953.00
Peter V. Lockwood	9.50	\$500	4,750.00
Julie W. Davis	19.50	\$365	7,117.50
Trevor W. Swett	.40	\$360	144.00
Rita C. Tobin	.20	\$265	53.00
Kimberly N. Brown	13.10	\$265	3,471.50
Bree A. Nicolai	8.90	\$145	1,290.50
Elyssa J. Strug	10.50	\$125	1,312.50

<u>Trans</u>	<u>Empl</u>	<u>Bill</u>	<u>Billing</u>	<u>Full Narrative</u>
<u>Date</u>	<u>Init</u>	<u>Rate</u>	<u>Hours</u>	
			2.30	Review filings, correspondence for status reports
07/02/01	PVL	500.00	.40	Telephone conference with Budd re: meeting (.2), review misc. filings (.1), review JWD memo (.1)
07/02/01	EJS	125.00	.00	Phone calls and e-mails with TB re fee application matters.
07/02/01	EJS	125.00	.50	Searched, retrieved and sent Matt Zaleski K&E fee summaries from the B&W case.
07/02/01	JWD	365.00	2.50	Prepare weekly status reports; conference with PVNL re same
07/02/01	KNB	265.00	.50	Conference with NDF, TWS and PVNL re: Debtors' recent motion
07/03/01	EJS	125.00	.50	Updated players list.
07/03/01	EJS	125.00	1.00	Updated players list with additional information received from PVNL.
07/03/01	EJS	125.00	.50	Retrieved and sent L. Tersigni and DC office monthly operating report.

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07/03/01	EJS	125.00	.50	Duplicated and distributed recently received court documents.
07/05/01	PVL	500.00	.60	Telephone conference with Zaleski re: pending matters (.1), review draft calendar and minutes (.2), review misc. filings (.1), telephone conference with Zaleski re: same (.2)
07/05/01	EJS	125.00	50	Meeting with EI re minutes and updated minute book.
07/05/01	EJS	125.00	50	Updated players list with additional information.
07/05/01	EJS	125.00	50	Reviewed M. Zaleski's calendar and phone calls and fax re documents needed to be added.
07/05/01	EI	630.00	.70	Tele/Speights re fraudulent conveyance issues (.5); tele/PVNL re same (.2).
07/08/01	PVL	500.00	.10	Review misc. correspondence (.1)
07/09/01	PVL	500.00	.80	Telephone conference with Milch re: status (.1), conference with JWD re: same (.2), review draft de minimus sales obj. (.1), telephone conference with EI re: status (.1), review misc correspondence (.1), review NY Times article (.2)
07/09/01	EJS	125.00	1.00	Duplicated and distributed recently received court documents.
07/09/01	KNB	265.00	7.00	Review POC motion; conference with JWD, PVNL re: response
07/09/01	EI	630.00	1.50	Tele/Budd, Dies re fraudulent conveyance case (.5); tele/PVNL re same (.2); memo circulating NYTimes article (.3); read article (.5).
07/10/01	PVL	500.00	20	Review misc. filings and correspondence (.2)

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07/10/01	JWD	365.00	2.30	Review filings, weekly calendar; conference with PVNL re status
07/10/01	KNB	265.00	5.60	Draft opposition to bar date motion
07/10/01	EI	630.00	.50	Tele/Speights (.3); tele/Budd (.2); all re fraudulent conveyance case.
07/11/01	PVL	500.00	30	Telephone conference with EI (.1), conference with EI (.1), review misc. filing and correspondence (.1)
07/11/01	EJS	125.00	50	Duplicated and distributed recently received court documents.
07/11/01	JWD	365.00	2.10	Draft weekly status reports
07/11/01	BAN	145.00	1.70	Discussing issues and getting assignment from KNB (.7); analyzing problem and printing cases (1.0).
07/12/01	EJS	125.00	1.00	Reviewed, duplicated and distributed recently received court documents.
07/12/01	JWD	365.00	40	Conference with PVNL re comments on weekly reports
07/16/01	PVL	500.00	50	Review miscellaneous filings, correspondence and e-mail (.4); conference with JWD regarding status (.1).
07/16/01	EJS	125.00	1.00	Reviewed, duplicated and distributed recently received court documents.
07/16/01	JWD	365.00	2.20	Review filings for status reports
07/16/01	BAN	145.00	7.20	Research for brief.
07/17/01	PVL	500.00	20	Review miscellaneous correspondence (.1); telephone conference with EI (.1).
07/17/01	EI	630.00	.40	Tele/Baena re fraudulent conveyance litigation (.2); tele/PVNL re same and hearing (.2).

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07/18/01	PVL	500.00	2.20	Review miscellaneous filings (.2); review agenda letter (.2); telephone call from Zaleski regarding 7/19 hearing (.2); prepare for 7/19 hearing (1.6).
07/18/01	JWD	365.00	1.10	Prepare weekly status reports
07/19/01	PVL	500.00	.50	Conference with Zaleski re: pending matters (.5)
07/19/01	EJS	125.00	.50	Updated players list with information from PVNL.
07/20/01	PVL	500.00	.40	Review misc. filings and correspondence (.1), telephone conference with Baena (.3)
07/23/01	PVL	500.00	50	Telephone conference with Zaleski (.4), review misc. filings (.1)
07/23/01	EJS	125.00	50	Updated EI files.
07/23/01	JWD	365.00	1.80	Review filings for previous week
07/24/01	EJS	125.00	50	Retrieved, duplicated and sent L. Tersigni various court documents including Orders.
07/24/01	JWD	365.00	1.80	Prepare weekly status reports
07/25/01	PVL	500.00	90	Review JWD status memo (.2), conferences with JWD re: same (.4), telephone conference with Zaleski re: status (.1), review draft calendar (.1), review report to comm. (.1)
07/26/01	PVL	500.00	50	Telephone conference with Pasquale re: pending matters (.5)
07/26/01	JWD	365.00	2.50	Draft memo to Committee from EI re status of case; confer with PVNL re same
07/27/01	PVL	500.00	1.00	Telephone conference with EI et al re: status (.4), telephone conference with Baena re: status (.3), telephone

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				conference with Davis re: status (.1), email Zaleski (.1), telephone conference with LeClair (.1)
07/27/01	RCT	265.00	.20	Review status memo re: upcoming tasks.
07/27/01	JWD	365.00	.50	Conference call with PVNL, TWS, NDF, EI re status of case, assignments
07/27/01	TWS	360.00	.40	Conf call with EI, PVNL, JWD re status and developments
07/30/01	PVL	500.00	30	Review misc. filings (.3)
07/31/01	PVL	500.00	10	Review Zaleski memo and telephone conference with Zaleski re: memo (.1)
<b>Total Task Code .04</b>		<b>65.20</b>		

**Employee Benefits/Pensions (.20 Hours; \$ 100.00)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peter V. Lockwood	20	\$500	100.00

<u>Trans</u>	<u>Empl</u>	<u>Bill</u>	<u>Billing</u>	<u>Full Narrative</u>
<u>Date</u>	<u>Init</u>	<u>Rate</u>	<u>Hours</u>	
07/11/01	PVL	500.00	20	Review obj. re: indemnity motion (.1) telephone conference with Zaleski re: same (.1)

<b>Total Task Code .06</b>	<b>.20</b>
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**Fee/Employment Applications (5.50 Hours; \$ 1,107.50)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Rita C. Tobin	3.00	\$265	795.00
Elyssa J. Strug	2.50	\$125	312.50

<u>Trans Date</u>	<u>Empl Init</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
07/02/01	RCT	265.00	1.00	Set up procedures for fee applications (.7); conference TB re: same (.2); conference ES re: same (.1).
07/10/01	RCT	265.00	50	Review time for June.
07/17/01	RCT	265.00	50	Review final time allocations for fee application.
07/24/01	RCT	265.00	1.00	Review and edit fee application (.8); conference ES re: same(.2)
07/24/01	EJS	125.00	2.00	Prepared quarterly fee application (proofing, editing, assembling, duplicating).
07/25/01	EJS	125.00	50	Corrected Exhibit C and part of Exhibit A to fee application.

**Total Task Code .07      5.50**

**Litigation (159.00 Hours; \$ 53,316.00)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peter V. Lockwood	21.30	\$500	10,650.00
Julie W. Davis	71.00	\$365	25,915.00
Trevor W. Swett	7.70	\$360	2,772.00
Kimberly N. Brown	45.20	\$265	11,978.00
Bree A. Nicolai	13.80	\$145	2,001.00

<u>Trans Date</u>	<u>Empl Init</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
		500.00	20	Review suppl. response re: section 105 motion (.2)
07/02/01	PVL	500.00	1.00	Conference with KNB re: bar date motion (.3), telephone conference with Zaleski re: same (.2), conference with JWD re: same (.3), review PD comm. motion re: doc retention (.2)
07/02/01	TWS	360.00	.20	Update KNB re status of pending litigation matters.
07/02/01	TWS	360.00	.20	Review motion to modify injunction
07/03/01	PVL	500.00	.80	Telephone conferences with Peterson re: POC issues (.6), telephone conference with Zaleski re: same (.2)
07/03/01	JWD	365.00	1.90	Conference call re Debtors motion re POC form/bar date; selection of counsel for fraudulent conveyance suits
07/03/01	TWS	360.00	1.00	Conf call with Committee re bar date and proof of claim issues
07/04/01	JWD	365.00	4.80	Review motion papers for bar date, etc.
07/05/01	PVL	500.00	2.00	Telephone conference with Baena re: bar date motion etc. (1.0), conference with JWD re: same (.8), telephone conference with EI re: same (.2)
07/05/01	JWD	365.00	5.10	Review B&W materials re bar date, POC; draft letters to law firms re affidavits re POCs; conference with PVNL re same (4.8); conference with TWS re B&W materials (.3)
07/06/01	PVL	500.00	5.30	Conference with EI and TWS re: fr. conv. lit. (.3), conference with Budd and EI re: same (.2), interview with Cozen and O'Connor (1.0), Holland and Knight (1.0), Leif Cabraser (1.0), LeClair (1.0), conference with PD



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				Comm. Budd, Davis, EI and TWS re: counsel (.5), conference with TWS re: same (.3)
07/06/01	JWD	365.00	3.20	Telephone conference with M. Peterson re affidavit re POCs; draft portion of brief re same
07/06/01	TWS	360.00	4.30	Interviews of prospective counsel for fraudulent conveyance suit
07/06/01	TWS	360.00	.30	Conf EI, PVNL re selection of counsel for fraudulent conveyance litigation
07/08/01	PVL	500.00	.20	Review draft Blomstrom aff. (.2)
07/08/01	JWD	365.00	5.20	Research re POC/bar date issues
07/09/01	PVL	500.00	80	Telephone conference with Peterson re: bar date motion (.2), memo to KNB (.1), conference with KNB re: bar date response (.4), conference with TWS re: same (.1)
07/09/01	JWD	365.00	5.50	Conference with KNB re legal factual issues re bar date, POC (.9); legal research re same (2.5); telephone conference with T. Goldberg, M. Peterson, R. Budd re affidavits (2.1)
07/10/01	JWD	365.00	90	Conference with KNB re bar date brief; discuss legal issues
07/10/01	TWS	360.00	50	TC from S.Baena re scheduling; TC to PVNL re scheduling
07/10/01	TWS	360.00	.10	Note from KNB re bar date issues; TC KNB re same
07/11/01	JWD	365.00	2.30	Conference with KNB re legal factual POC, bar date issues; telephone conference with M. Peterson, M. Zaleski re status of extension
07/11/01	KNB	265.00	8.40	Draft opposition to bar date motion; conference with JWD, Bruce summer associate and BN re: same

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07/12/01	PVL	500.00	.30	Review POC affs. (.2), review Peterson memo (.1)
07/12/01	PVL	500.00	.50	Review Sealed Air response (.1), review NMC response (.1), review Grace response (.3)
07/12/01	JWD	365.00	7.20	Review M. Peterson affidavit, comments on Grace POC brief (1.3); draft section of brief dealing with these issues (2.8); revise, edit rest of brief (2.3); telephone conference with M. Peterson re same (.8)
07/12/01	KNB	265.00	6.40	Draft opposition to bar date motion; conference with BN re: same
07/12/01	BAN	145.00	4.20	Research for KNB for brief.
07/13/01	PVL	500.00	1.20	Conference with EI regarding case preparation (.2); telephone call from Baena regarding fr. conv. and bar date (.4); telephone call with TWS regarding 7/19 hearing (.2); review miscellaneous filings and correspondence fr. conv. and discovery (.4).
07/13/01	TWS	360.00	.40	Read submissions responding to joint motion to prosecute fraudulent conveyance actions
07/13/01	TWS	360.00	10	TC M.Zaleski re debtor's motion for omnibus settlement procedure
07/13/01	BAN	145.00	3.50	Research for brief for KNB.
07/14/01	JWD	365.00	4.50	Review M. Peterson materials; draft affidavit
07/15/01	JWD	365.00	5.50	Revise, edit Peterson affidavit; revise, edit brief re bar date
07/16/01	PVL	500.00	.50	Telephone call from EI (.1); review Zonolite and medical monitoring class objections to case management motion

				(.3); telephone call from Zaleski regarding hearing (.1).
07/16/01	KNB	265.00	9.00	Draft opposition to POC motion.
07/17/01	PVL	500.00	3.40	Telephone call from Baena regarding 7/19 hearing matters (1.4); telephone call from Zaleski regarding same (.5); conference with JWD regarding same (.2); review Vincent declarations and exhibits to case management objections of Zonolite and medical monitoring classes (1.3).
07/17/01	KNB	265.00	8.40	Draft opposition to POC motion.
07/17/01	BAN	145.00	4.70	Research and discussing findings w/KNB.
07/18/01	PVL	500.00	.40	Telephone call from Running regarding POC issues (.3); telephone call from Peterson regarding same (.1).
07/18/01	KNB	265.00	6.10	Draft opposition to POC motion; conference with JWD regarding same.
07/18/01	TWS	360.00	.10	Review recent correspondence and filings
07/18/01	BAN	145.00	1.40	Research and reviewing brief.
07/19/01	PVL	500.00	4.70	Prepare for hearing re: fr. conv. case (3.2), attend hearing re: same (.9), conferences with Zaleski and Campbell re: hearing (.6)
07/19/01	JWD	365.00	4.90	Conference with M. Peterson re affidavit; revise, edit same
07/20/01	JWD	365.00	1.30	Revise, edit POC brief
07/20/01	TWS	360.00	20	Attention to RCT legal memorandum on state law causes of action; TC RCT re same
07/22/01	JWD	365.00	2.30	Revise, edit POC brief

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07/24/01	TWS	360.00	30	Review pending motions
07/25/01	JWD	365.00	4.30	Revise, edit POC brief
07/26/01	JWD	365.00	1.90	Revise, edit M. Peterson affidavit
07/27/01	JWD	365.00	4.60	Revise, edit POC brief
07/30/01	JWD	365.00	3.30	Revise, edit M. Peterson affidavit, POC brief; discuss with KNB
07/30/01	KNB	265.00	4.40	Conference with JWD re: opposition to bar date motion
07/31/01	JWD	365.00	2.30	Revise, edit brief; conference with KNB re same
07/31/01	KNB	265.00	2.50	Draft opposition to bar date brief; conference with JWD re: same

**Total Task Code .10            159.00**

**Committee Meetings/Conferences (4.90 Hours; \$ 2,357.50)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Elihu Inselbuch	2.00	\$630	1,260.00
Peter V. Lockwood	1.40	\$500	700.00
Kimberly N.Brown	1.50	\$265	397.50

<u>Trans Date</u>	<u>Empl Init</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
07/03/01	PVL	500.00	1.40	Telephone conference with Committee et al. (1.4)
07/03/01	KNB	265.00	.50	Telephone conference with Comm. re: motion re: proof of claim form
07/03/01	EI	630.00	1.00	Committee conference call re bar date issue.

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07/05/01	EI	630.00	.30	Reviewed draft minutes and tele/Zaleski re same (.3).
07/16/01	EI	630.00	.70	Memo to committee re futures rep (.5); tele/LeClair (.2).
<b>Total Task Code .15</b>		<b>4.90</b>		

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**Travel (3.10 Hours; \$ 635.00)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Peter V. Lockwood	1.10	\$250	275.00
Trevor W. Swett	2.00	\$180	360.00

<u>Trans Date</u>	<u>Empl Init</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
			2.00	Travel to NY and return travel to DC re Committee Meeting
07/19/01	PVL	250.00	1.10	Travel to Wilmington, DE for hearing
<b>Total Task Code .16</b>		<b>3.10</b>		

**Docket Review & Control (50.90 Hours; \$ 6,173.00)**

<u>Attorney</u>	<u>Number of Hours</u>	<u>Billing Rate</u>	<u>Value</u>
Trevor W. Swett	.50	\$360	180.00
Robert C. Spohn	8.10	\$135	1,093.50
Elyssa J. Strug	3.50	\$125	437.50
Heather M. Dowie	22.50	\$115	2,587.50
Stacie M. Evans	16.30	\$115	1,874.50

<u>Trans Date</u>	<u>Empl Init</u>	<u>Bill Rate</u>	<u>Billing Hours</u>	<u>Full Narrative</u>
			1.00	Updated Court Documents, Indexes & Files.
07/16/01	HMD	115.00	2.50	Updated Court Documents, Indexes & Files.
07/17/01	EJS	125.00	.50	Updated EI and PVNL agenda.
07/17/01	EJS	125.00	.50	Worked on EI hearing files.
07/17/01	HMD	115.00	.50	Updated Court Documents, Indexes & Files.

07/18/01	HMD	115.00	1.50	Updated Court Documents, Indexes & Files.
07/20/01	RCS	135.00	1.30	Review and organize documents received, update indices.
07/24/01	EJS	125.00	.50	Updated EI hearing files.
07/24/01	RCS	135.00	.40	Gather documents required by attorney.
07/24/01	HMD	115.00	3.00	Updated Current New York City Office Bankruptcy Litigation Calendar.
07/25/01	EJS	125.00	.50	Updated EI & PVNL agenda.
07/25/01	HMD	115.00	.50	Updated Court Documents, Indexes & Files.
07/26/01	RCS	135.00	.70	Review and organize documents for filing.
07/27/01	HMD	115.00	1.00	Updated Court Documents, Indexes & Files.
07/30/01	HMD	115.00	.50	Updated Court Documents, Indexes & Files.
07/31/01	RCS	135.00	.60	Gather background documents used by attorney in preparation for filing of opposition to motion and organize for filing.
07/31/01	HMD	115.00	.50	Updated Current New York City Bankruptcy Litigation Calendar.
07/31/01	HMD	115.00	.50	Updated Court Documents, Indexes & Files.
07/31/01	SME	115.00	3.20	Analyze, arrange, and index various documents including pleadings, correspondence, and background research.
<b>Total Task Code .17</b>		<b>50.90</b>		

**Other Charges:**

Long Distance Telephone - Equitrac In-House	456.86
NYO Long Distance Telephone	11.50
Long Distance Telephone - Chged Credit Card	237.61
Telecopier	93.00
Travel Expenses - Ground Transportation	20.00
Meals Related to Travel	4.01
Conference Meals	9.55
Postage	5.88
Air Freight & Express Mail	77.40
Database Research	5,511.40
Local Transportation - NY	72.93
Outside Local Deliveries	8.01
Duplicating	964.05

Total:	\$ 7,472.20
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